

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re

Lordstown Motors Corp., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

**Re: Docket Nos. 935 & 964**

**CERTIFICATION OF COUNSEL REGARDING ORDER GRANTING CONTINUANCE  
OF DEBTORS' SECOND MOTION TO EXTEND THE DEBTORS' EXCLUSIVE  
PERIODS TO FILE AND SOLICIT VOTES ON A CHAPTER 11 PLAN**

The undersigned counsel to the above-captioned debtors and debtors-in-possession (the “**Debtors**”) hereby certifies as follows:

1. On January 29, 2024, the Debtors filed the *Debtors' Second Motion to Extend the Debtors' Exclusive Periods to File and Solicit Votes on a Chapter 11 Plan* [Docket No. 935] (the “**Motion**”) with the United States Bankruptcy Court for the District of Delaware (the “**Court**”).

2. Pursuant to the notice filed with the Motion, any objection or response to the relief requested in the Motion was to be filed and served so as to be received no later than **February 12, 2024 at 4:00 p.m. (Eastern Time)** (the “**Objection Deadline**”).

3. Prior to the Objection Deadline, the Debtors received from Rahul Singh (“**Mr. Singh**”) the *Objection of Rahul Singh to Debtors' Second Motion to Extend the Debtors' Exclusive Periods to File and Solicit Votes on a Chapter 11 Plan* [Docket No. 964] (the “**Objection**”). The Objection was docketed by the Court on February 12, 2024.

4. A hearing on the Motion and Objection is scheduled for February 22, 2024 at 10:30 a.m. (the “**Hearing**”).

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<sup>1</sup> The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corporation (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors' service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

5. In an effort to conserve estate resources, the Debtors have requested a continuance of the Motion until the hearing scheduled for March 5, 2024 at 3:00 p.m. (ET). Mr. Singh does not consent to the continuance. Both the Official Committee of Equity Holders and the Official Committee of Unsecured Creditors consent to the continuance.

*[Remainder of Page Intentionally Left Blank]*

WHEREFORE, the Debtors respectfully request that the proposed order attached hereto as

**Exhibit A** granting the continuance be entered at the earliest convenience of the Court.

Dated: February 13, 2024  
Wilmington, Delaware

<p><u>/s/ Morgan L. Patterson</u> <b>WOMBLE BOND DICKINSON (US) LLP</b> Donald J. Detweiler (DE Bar No. 3087) Morgan L. Patterson (DE Bar No. 5388) 1313 North Market Street, Suite 1200 Wilmington, Delaware 19801 Telephone: (302) 252-4320 Facsimile: (302) 252-4330 don.detweiler@wbd-us.com morgan.patterson@wbd-us.com</p> <p><i>Counsel to the Debtors and Debtors in Possession</i></p>	<p><b>WHITE &amp; CASE LLP</b> Thomas E Lauria (admitted <i>pro hac vice</i>) Matthew C. Brown (admitted <i>pro hac vice</i>) Fan B. He (admitted <i>pro hac vice</i>) 200 South Biscayne Boulevard, Suite 4900 Miami, FL 33131 Telephone: (305) 371-2700 tlauria@whitecase.com mbrown@whitecase.com fhe@whitecase.com</p> <p>David M. Turetsky (admitted <i>pro hac vice</i>) 1221 Avenue of the Americas New York, NY 10020 Telephone: (212) 819-8200 david.turetsky@whitecase.com</p> <p>Jason N. Zakia (admitted <i>pro hac vice</i>) 111 South Wacker Drive, Suite 5100 Chicago, IL 60606 Telephone: (312) 881-5400 jzakia@whitecase.com</p> <p>Roberto Kampfner (admitted <i>pro hac vice</i>) Doah Kim (admitted <i>pro hac vice</i>) RJ Szuba (admitted <i>pro hac vice</i>) 555 South Flower Street, Suite 2700 Los Angeles, CA 90071 Telephone: (213) 620-7700 rkampfner@whitecase.com doah.kim@whitecase.com rj.szuba@whitecase.com</p> <p><i>Counsel to Debtors and Debtors in Possession</i></p>
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